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3	
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6	Proposed Counsel for Lenard E. Schwartzer,
7	Chapter 11 Trustee
8	UNITED STATES
9	DISTRIC
10	In re
11	HOTEL FURNITURE SALES, INC.,
12	Debtor
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18	I, Lenard E. Schwartzer, do hereby de
19	1. I am over the age of eighteen

STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

Debtor.

Chapter 11

DECLARATION OF LENARD E. SCHWARTZER IN SUPPORT OF **MOTION OF CHAPTER 11 TRUSTEE** FOR CONVERSION OF CASE TO CASE **UNDER CHAPTER 7**

Case No. BK-S-09-29126-mkn

Date: OST pending Time: OST pending

- hereby declare under penalty of perjury as follows:
- eighteen and am competent to make this Declaration. I have personal knowledge of the facts in this matter, except where stated upon information and belief.
- 2. I am the duly appointed Chapter 11 Trustee for the estate of Hotel Furniture Sales, Inc. (the "Debtor").
- 3. I make this Declaration in connection with the Motion of Chapter 11 Trustee for Conversion of Case to Case Under Chapter 7 (the "Motion") filed concurrently with this Declaration, and if called to testify, I could and would testify to the following statements set forth herein.

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	4.	On or about October 12, 2009 (the "Petition Date"), the Debtor filed a voluntary
peti	ition for re	lief under Chapter 11 of the Bankruptcy Code. The Debtor has continued to manage
its a	affairs as d	ebtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

- 5. On or about July 13, 2010, the Court entered an Order Granting Motion for Order Converting Case to Chapter 7 or for Appointment of Chapter 11 Trustee or Examiner [Docket No. 150].
- On or about July 13, 2010, the Office of the United State Trustee filed the 6. Appointment of Lenard E. Schwartzer As Trustee For The Estate of Hotel Furniture Sales, Inc. [Docket No. 151]. The Debtor sells furniture to the public.
- 7. Since my appointment, my staff and I have been diligently working to understand the scope and value of the Debtor's business and property in an effort to promptly determine the most efficient manner to administer the assets of these estates.
- 8. I have concluded that post-petition financing is necessary for the Debtor to successfully reorganize pursuant to Chapter 11, and that without such financing continued operation of the business in Chapter 11 will not result in a confirmable plan of reorganization
- 9. I have received notice from Debtor's counsel confirming that the Debtor is unable to secure the financing required to continue operating the business. (See Exhibit "1" to Motion)
- 10. I have also concluded that the Debtor's assets can be liquidated just as effectively and efficiently in Chapter 7 as in Chapter 11.
- 11. I believe that if this bankruptcy case were to continue in Chapter 11, the Debtor's estate does not contain the requisite cash necessary in order to fund the administrative expenses that will be incurred by the Debtor's estate on an ongoing basis.

I declare, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge, information and belief.

Dated this day of July, 2010.

Lenard E. Schwartzer, Chapter 11 Trustee